

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

UNITED STATES OF AMERICA,	)	
	)	
<i>Plaintiff,</i>	)	
	)	No.: 23 CR 369-1
vs.	)	
	)	Hon. John F. Kness
FEROZ JALAL, et al.,	)	
	)	
<i>Defendants.</i>	)	

**DEFENDANT FEROZ JALAL'S UNOPPOSED MOTION TO MODIFY  
CONDITIONS OF RELEASE**

Now comes the defendant, Feroz Jalal, by and through his undersigned attorney, and respectfully moves this Honorable Court to enter an order modifying the conditions of release to remove his electronic monitoring bracelet on May 16, 2025, pending his surrender to FCI Thompson on May 19, 2025, and allow additional movement to St. Francis Evanston hospital on May 16, 2025, for a 1:30pm MRI. In support, the following is offered:

1. On October 26, 2023, the grand jury returned a four-count indictment charging Mr. Jalal with three counts of bank fraud in violation of 18 U.S.C. § 1344, and one count of money laundering in violation of 18 U.S.C. §1957.
2. As part of his conditions of pretrial release, Mr. Jalal is subject to home incarceration with electronic monitoring.

3. On February 11, 2025, this Court sentenced Mr. Jalal to a term of 62 months' imprisonment. He has a surrender date of May 19, 2025 at 2:00pm, at which time he will be surrendering to FCI Thompson in Thompson, Illinois.

4. Mr. Jalal has an MRI appointment with Dr. Jame M. Voci at the St. Francis Evanston Hospital located at 800 Austin St., Evanston, Illinois 60202 at 1:30pm on May 16, 2025, 3 days prior to his surrender to the Bureau of Prisons. The undersigned has provided proof of the appointment to both the government and Pretrial Services. As this Court knows based on Mr. Jalal's prior request to get an MRI, the electronic monitoring bracelet must be removed prior to the procedure.

5. Upon contacting the government and Pretrial Services regarding this request, Pretrial Services Officer Daniel Dominguez suggested that since Mr. Jalal is surrendering 3 days after the MRI, that he not be put back on the electronic monitoring bracelet once it is removed the morning of May 16, 2025.

6. This Court has previously removed Mr. Jalal's electronic monitoring bracelet for purposes of an MRI with no incident. Dkt. 76.

7. Neither the government nor Pretrial Services have any objection to removing his electronic monitoring bracelet the morning of May 16, 2025 pending his surrender, and allowing him to go to St. Francis Evanston Hospital for an MRI so long as Mr. Jalal remain in touch telephonically with Pretrial Services after his appointment to confirm he is back home and when he leave for FCI Thompson on May 19, 2025. Mr. Jalal will so abide.

Wherefore, for the reasons stated above, defendant Feroz Jalal respectfully moves this Honorable Court to enter an order modifying the conditions of his release to remove his electronic monitoring bracelet on May 16, 2025, pending his surrender to FCI Thompson on May 19, 2025, and allow additional movement to St. Francis Evanston hospital on May 16, 2025, for a 1:30pm MRI. Respectfully submitted,

/s/ Vadim A. Glozman  
*Attorney for Feroz Jalal*

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**CERTIFICATE OF SERVICE**

I, Vadim A. Glozman, an attorney for Defendant Feroz Jalal, hereby certify that on this, the 8th day of May 2025, I filed the above-described document on the CM-ECF system of the United States District Court for the Northern District of Illinois, which constitutes service of the same.

Respectfully submitted,

/s/ Vadim A. Glozman